

**Legal Points of
Consideration for Online
Teaching: A Guide
for Teachers of Japanese
Language in the UK**

The British Association
for Teaching Japanese
as a Foreign Language

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Disclaimer

The following guidelines have been created based on information gathered and observations made by its authors, the Project Members of the Japan Year Abroad Project Inter-University Support Programme (J-YAP IUSP). Additional supervision of Chapters 1 and 2 was carried out by S&K Brussels LPC (S&K Brussels 法律事務所).

Due to the ever-changing nature of legislation, institutional policies, online platform user manuals and other areas covered in these guidelines, please be aware that any information or advice given is subject to change. For the most up-to-date guidance, please refer to the official pages of the organisations referenced below, or, if you are employed by an institution, seek advice via your workplace.

The authors of these guidelines cannot take responsibility for their contents beyond the point at which their research was completed, at the end of March 2021.

J-YAP IUSP Project Members

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Introduction

Due to lockdowns and other factors related to the spread of Covid-19, Japanese teaching which would previously have been carried out in the classroom has switched to online lessons.

When setting up online courses, it is necessary to pay attention to regulations and processes such as those concerning the protection of personal data. In particular, this includes General Data Protection Regulation (GDPR) and Data Protection Impact Assessments (DPIA). Moreover, it is worth noting the concerns among teachers surrounding personal data protection in relation to the online platform Zoom, which is used in various countries around the world.

In order to appropriately address such concerns, Chapters 1 and 2 of these guidelines have been created with the support of S&K Brussels LPC (S&K Brussels 法律事務所), who have provided legal counsel in relation to the various challenges associated with establishing the J-YAP IUSP virtual year abroad programme for students at UK universities (for more details, see the J-YAP IUSP website: [English](#) | [Japanese](#)).

The structure and contents of these guidelines are as follows.

Chapter 1: GDPR, Privacy Notices and DPIA (Fumiko Narumi-Munro).

- This chapter introduces general concepts related to GDPR, privacy notices and DPIA in an educational context, providing examples and templates of privacy notices and DPIA.

Chapter 2: ICT and Privacy Guidelines for Japanese Language Teachers in the

UK (Toshihiko Kitagawa).

- This chapter provides guidelines on how teachers should handle sensitive information in order to comply with privacy policies.

Chapter 3: Copyright (Mika Takewa).

- This chapter covers general issues concerning copyright in relation to online learning and teaching.

Chapter 4: Inclusive Learning and Teaching (Akiko Furukawa and Mayuko Inagawa).

- This chapter focuses on the basic principles of and practical tips for creating an inclusive learning environment. It aims to provide advice on what to do before, during and after sessions, as well as on how to produce accessible handouts, PowerPoint presentations and so on.

Chapter 5: Comparison of Online Platforms (Kumi Casey and Ritsuko Koso-Kirk).

- This chapter provides a quick comparison of the platforms that may be commonly used to facilitate online lessons, addressing several key areas of concern for teachers of Japanese.

Chapter 1: GDPR, Privacy Notices and DPIA

1. GDPR: A General Overview

1) What is GDPR?

The General Data Protection Regulation (GDPR) is a data privacy and security law put into effect in May 2018 by the European Union (EU). The GDPR applies to any personal data processing activities by entities (including companies, public authorities, natural persons etc.) which are either based in the EU or offer goods and/or services to, or monitor the behaviour of, individuals located in the EU. Therefore, the GDPR can be applied anywhere in the world if the collected data is related to people in the EU, such as where educational services are provided to EU-based individuals.

In the UK, a similar set of regulations (the UK GDPR alongside the Data Protection Act 2018) applies to protect and secure the personal data of individuals in the UK. The UK GDPR still applies after the transition period of Brexit.

2) What is Personal Data and Sensitive Data?

Under both the GDPR and UK GDPR, personal data includes any information relating to natural persons who can be identified, directly or indirectly, using such information, alone or in combination with other personal information.

Personal data include, but are not limited to:

- Identifiers, such as name and identification number (including student identification numbers).

- Contact details, such as phone number and email address.
- Location data.
- Online identifiers such as cookies or computer IP address.
- Factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person.

([ICO](#) and [the University of Edinburgh](#))

Personal data is a very broad concept and can include, for example, a student's written answers during a test and any remarks from the teacher regarding such answers if that information could lead to the identification of the student.

Subjective data such as opinions, judgments and evaluations could also be considered personal data under the GDPR and UK GDPR.

Some personal data can be sensitive and require more protection. The UK GDPR defines special category data (i.e. sensitive data) as:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data (where used for identification purposes).
- Data concerning health.
- Data concerning a person's sex life.

- Data concerning a person's sexual orientation.

([ICO](#))

3) What Does GDPR/UK GDPR Mean to the Educational Sector?

Educational institutions collect, store, control and process personal data of students and staff, amongst others, so must therefore comply with the GDPR and UK GDPR.

This also means that educational institutions are required to:

- Have a privacy notice.
- Appoint a Data Protection Officer (DPO).

4) What is a Privacy Notice?

A privacy notice is a public document from an organisation that explains, in concise and easy-to-understand terms, how that organisation processes personal data, any risks or consequences associated with such processing, and how the organisation applies data protection principles ([GDPR.EU, no date b](#)).

The GDPR and UK GDPR provide detailed instructions regarding privacy notices, the main points of which are summarised below.

Privacy notices must be easily accessible (and free of charge) for all individuals whose personal data an organisation collects. For organisations which maintain websites, privacy notices should be published online, with a conspicuous link on each page of the website so that users do not have to seek out the information.

In terms of timing, privacy notices must generally be provided to individuals at

the point at which an organisation collects their data.

In terms of content, privacy notices must generally cover the following information:

1. Relevant contact information (preferably including multiple means of communication) of the organisation and its DPO.
2. Purposes for processing personal data.
3. Legal bases for processing personal data. The GDPR and UK GDPR set forth six possible legal bases: consent, contract, legal obligation, vital interests, public task and legitimate interests (the latter of which must be specified). The appropriate legal bases will depend on the specific circumstances at hand.
4. Categories of personal data concerned if the personal data is collected from a source other than the data subject.
5. Recipients of the personal data (identified by name or specified according to category/industry/sector) in the event of a disclosure, and where such disclosure involves a transfer of personal data outside the EU or UK, details of said transfer and the relevant legal mechanism.
6. Retention of data (how long the organisation stores the data).
7. An explanation of individuals' GDPR/UK GDPR rights with respect to their personal data, applicable limitations on such rights (if any), and details as to how data subjects may access their rights including:
 - a. Access.

- b. Rectification.
 - c. Erasure (“the right to be forgotten”).
 - d. Restriction on processing.
 - e. Objection to processing.
 - f. Portability.
 - g. The right to withdraw consent at any time (where processing is based on consent).
 - h. The right to make a complaint with a supervisory authority.
8. The existence of and details regarding any automated decision-making system (including profiling) using the personal data (if applicable).

[\(GDPR.EU, no date b; the University of Edinburgh, 2020a\)](#)

An institution’s privacy notice(s) must cover students, staff and any other individuals whose personal data it collects and processes (e.g. applicants, alumni and visitors).

If a member of staff starts a new project that deals with personal data, it may be necessary to update the relevant privacy notice to ensure it covers any new processing activities, legal bases, etc.

Please see below for links to two sample privacy notice templates and an example of a completed privacy notice from J-YAP IUSP:

- [Writing a GDPR-compliant privacy notice](#), GDPR.EU.
- Template Privacy Notice [Part 1](#) and [Part 2](#), the University of Edinburgh.

- [J-YAP IUSP Project Privacy Notice](#), J-YAP IUSP.

5) What is a Data Protection Officer (DPO)?

A DPO assists an institution and its staff by:

- Monitoring compliance with the UK GDPR.
- Informing, advising and issuing recommendations regarding data protection obligations.
- Providing advice where requested regarding Data Protection Impact Assessments (DPIA).
- Serving as a contact point for data subjects and the Information Commissioner's Office (ICO).

([ICO, no date d](#))

Please note that while a DPO is there to provide assistance, the institution and its staff – not the DPO – are responsible for any instances of non-compliance with the UK GDPR.

6) Why Must Organisations Have a DPO?

Under the GDPR and UK GDPR, organisations must appoint a DPO if any one of the following applies:

- They are a public authority or body (except for courts acting in their judicial capacity).
- Their core activities require large scale, regular and systematic monitoring of individuals (e.g. online behaviour tracking).

- Their core activities consist of large-scale processing of special categories of data (sensitive data) or data relating to criminal convictions and offences.

Educational institution such as schools or universities are public authorities in the UK, and thus they are required to appoint DPOs.

7) What Does GDPR Mean for Private Tutors?

The GDPR and UK GDPR apply to a wide range of entities that process personal data, including natural or legal persons, public authorities, agencies and other bodies. Therefore, similarly to schools and universities, private tutors who independently collect, store, control and process personal data of students must also comply with the UK GDPR.

The nature of an entity's data protection obligations will depend on whether or not they determine the purpose and means of their personal data processing. In GDPR/UK GDPR terms, this is described as whether they act as a "controller" or a "processor" with respect to personal data. Although different, both controllers and processors have data protection obligations under the GDPR/UK GDPR.

For individuals such as teachers who process personal data in their capacity as employees of a school or university, it is the institution itself rather than its employees which will typically be considered a "controller" and be bound by the GDPR/UK GDPR as such. Individual private tutors who independently determine the purpose and means of processing of students' personal data will also be considered controllers under the GDPR/UK GDPR. This is in contrast to

certain subcontracted tutors who may not have such decision-making capacity over personal data processing, rendering them processors.

Whether acting as a controller or processor, the relevant data protection principles of the GDPR/UK GDPR will apply.

8) GDPR in Learning Technologies

Personal data collected through learning technologies is also an important consideration when assessing GDPR/UK GDPR compliance obligations.

For example, if as a teacher you use a web-based service (e.g. Zoom, Microsoft Teams and Kahoot!) in connection with your educational activities, that service may collect and process users' information, including personal data, to a greater extent than you may realise. Such service's collection and processing activities may also vary depending on the type of account you use.

For instance, if you were to access a specific web-based service using an official institutional or educational account, the settings governing the collection and processing of your and your students' personal data may be different than if you were to access the same service using a personal or free account.

Additionally, if you belong to an educational institution, please check with your DPO regarding whether a data processing agreement has been executed with any such web-based service, as this will also impact its personal data collection and processing practices.

In any case, unless you or your institution prepares appropriately for the collection and processing activities of web-based services, it is possible to

unintentionally violate the GDPR/UK GDPR. Appropriate preparations to avoid such accidental violations include:

- Ensuring that there is an adequate legal basis for the collection and processing of your and your students' personal data.
- Confirming that appropriate disclosures are included in your privacy notice.
- Checking that such activities are accounted for in your DPIA (to the extent your institution is required to conduct one).

9) What is a Personal Data Breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate acts (including acts from within your organisation). It also means that a breach is more than about simply losing personal data ([ICO, no date d](#)).

Incidents which may constitute or ultimately result in personal data breaches under the GDPR include:

- Loss or theft of data or equipment on which data is stored (such as a laptop).
- Ineffective access controls allowing unauthorised use.
- Equipment failure.
- Unauthorised disclosure (e.g. an email sent to the incorrect recipient).

- Human error.
- Hacking attack.

[\(The University of Edinburgh, 2021\)](#)

Additional details regarding data breaches can be found in Chapter 2, Section 2 (“Storage of Personal Data”).

In order to avoid personal data breaches, it may help to conduct a DPIA to identify and minimise risk. Please see the section below for more details.

2. Data Protection Impact Assessment (DPIA)

A DPIA is a process to help identify the impact of an envisaged processing activity on the protection of personal data, and to minimise the risks of such activity to the rights and freedoms of natural persons.

A DPIA must:

- Describe the nature, scope, context and purposes of the processing.
- Assess necessity, proportionality and compliance measures.
- Identify and assess risks to individuals.
- Identify any additional measures to mitigate those risks.

[\(ICO, no date d; European Commission, 2017\)](#)

1) When Must a DPIA Be Carried Out?

Generally, a DPIA should be conducted for any project which is likely to result in a “high risk to the rights and freedoms of natural persons” ([EU GDPR, L 119/15](#)).

In educational contexts, a DPIA is required where the processing activity involves any two of the following factors in combination:

- The application of new technology or innovative use of technology (note that popular technology platforms such as Zoom, Microsoft Teams, Kahoot!, etc. would usually not be considered to require a DPIA).
- Data processing on a large scale (measured by the number of data subjects, duration of processing, volume of data, etc.).
- Data concerning vulnerable data subjects, such as children and employees.
- Processing involving sensitive data or highly personal data.
- Evaluation or scoring, including profiling or predicting (especially where that involves aspects concerning work performance, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements).
- Systematic monitoring of a publicly accessible area (such as by CCTV).

If you are unsure whether a DPIA is required by law, it is always best practice to conduct the DPIA. Conversely, if you determine that a DPIA is not required, then you should justify and document your reasons for such a decision, including by recording the views of your DPO.

When conducting a DPIA, you must seek the advice of your DPO, as well as consult with other stakeholders such as other teachers and students.

([ICO, no date d](#); [European Commission, 2017](#))

Example scenarios:

- 1) You decide to use Kahoot! in class, either online or on-campus. You checked your institution's DPIA list but there isn't any DPIA for Kahoot! (no one in your institution has done one for Kahoot). You consult with your institution's DPO. Although Kahoot! is new to your institution, it is commonly used across educational institutions and therefore your DPO advises that no DPIA is required.
- 2) You are going to start a special online session series for your students with a Japanese university or school for cultural/language exchange. You will collect participants' data (names, email addresses, affiliation etc) for organising and managing the online sessions. Since you and your DPO determine that there are no "high risk" indicators, you – following your DPO's advice – decide not to conduct a DPIA.
- 3) You secured funding for a project that relates to your teaching and will need to use your students' academic performance data, as well as to conduct surveys to collect data from your students which will likely involve evaluation, scoring and predicting. Your project might involve the use of new technology, but in any case, it does involve evaluation and scoring, so you decide to conduct a DPIA.

2) Online Services and Data Processing

What data is collected from students/participants and how is it gathered?

- Typically, the names and contact details of students and teaching staff are collected and processed. However, some data – such as students'

marks, scores of online tests and access data like IP addresses or access dates – can also be collected by teachers and/or online service providers (such as Quizlet, Blackboard Learn, Moodle, Zoom). In such instances and depending on the circumstances, either you or the online provider may be required to conduct a DPIA. Please check with your DPO if you are using any online technologies in your classroom.

Examples of teaching tools which may collect and process additional personal data include:

- Tools and programmes (e.g. PCs, smartphone, MS Outlook, Audacity).
- Teaching platforms involving video meetings (e.g. Zoom, BB Collaborate, MS Teams).
- Teaching platforms utilising virtual learning environment/learning management systems (e.g. Moodle, BB Learn, Canvas).
- Other learning programmes and services (e.g. Google Forms, online flashcards, video streaming services like YouTube).

3) Carrying Out a DPIA

Before carrying out a DPIA:

1. Always begin by contacting your institution's DPO. They will provide support and advice on whether a DPIA is required and how to conduct one.
2. If you teach privately, closely upholding the GDPR/UK GDPR processing principles summarised below will generally enable you to avoid the need

to conduct a DPIA. However, if you believe a DPIA is required, you may use a DPIA template found online. Alternatively, please see the DPIA steps below.

To carry out a DPIA, follow the below steps.

1) Submit controller and DPO details.

- If you are a teacher or other teaching staff/researcher, then generally your organisation will be the controller, but sometimes – such as for self-employed private tutors – you may be the controller.

2) Identify the need for a DPIA.

- What is the project? What data is processed? Why you need a DPIA?

3) Describe the processing.

- Nature of the processing: how do you collect, use, store and delete data? What is the source of the data? Is data shared? What types of processing identified as likely high risk are involved?
- Scope of the processing: what is the nature of data? How much data is collected/used? How long will you keep the data? How many data subjects are affected? What geographical area is covered?
- Context of the processing: what is your relationship with the individuals affected? Do they include children or other vulnerable groups? Is the processing novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in?

- Purpose of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing, both for you and more broadly speaking?

4) Consultation process.

- When and how will you consult with relevant stakeholders (including the DPO and the data subjects or their representatives)?

5) Assess necessity and proportionality.

- Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? What information to be given to the individuals? How will you support their rights?

6) Identify and assess risks.

- Include: source of risks and nature of impact on individuals, likelihood and severity of harm and overall risk.

7) Identify measures to reduce risks described as “medium” or “high” in step 5.

- For such measures, include effect on risks, residual risks and whether the measures have been approved.

8) Sign off and record outcomes.

- Who approved the measures? Who approved the residual risks? Who provided DPO advice and a summary thereof?

For more detailed instructions, please refer to the [sample DPIA template](#) from

the ICO.

To access an example of a DPIA, please refer to the J-YAP IUSP DPIA (see Appendix). This DPIA was carried out by the J-YAP IUSP project members and approved by the DPO at the University of Edinburgh via [OneTrust](#).

4) GDPR/UK GDPR Data Processing Principles

The GDPR/UK GDPR data processing principles are:

- Data minimisation: always collect and process the **minimum** amount of personal data necessary for your purposes.
- Purpose limitation: collect personal data only for **specified, explicit and legitimate purposes** and do not process such data in any manner incompatible with such purposes.
- Storage limitation: retain personal data **only for as long as is necessary** to achieve your purposes (or longer, if required by law).
- Integrity and confidentiality: always keep personal data **secure** from unauthorised access, loss, theft or destruction.
- Accuracy: keep the personal data **accurate** and up to date.
- Lawfulness, fairness and transparency: always process personal data in a manner which is **lawful, fair and transparent** in relation to individuals.

How are data processing principles applied to online teaching?

- If your teaching is for your institution, the DPIA (where required) should be conducted institutionally. However, whenever you are planning to use

a new technology/system/service, or if a particular project might implicate any of the DPIA indicators referenced in the above “When Must a DPIA Be Carried Out?”, it is worth checking with your institution’s DPO for advice in case a DPIA is required but has not yet been conducted.

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Appendix

Appendix A: Definitions of the Terms Used in Data Protection Legislation

- **Personal Data:** personal data is data about a living individual who is identifiable, either directly or indirectly, through such data. Personal data may include so-called identifiers (such as name, identification number, GPS location data or online identifiers such as a computer IP address), as well as de-identified, encrypted or pseudonymised personal data. Personal data does **not** include anonymised data.
- **Data subject:** a data subject is an individual who is the subject of personal data.
- **Controller:** a controller determines the purposes and means of processing, i.e. the why and how of processing. Controllers must decide on both purposes and means, and have overall responsibility for the data, although some more practical aspects of implementation (“non-essential means”) can be left to the processor. It is not necessary that the controller actually has access to the data that is being processed to be qualified as a controller.
- **Processing:** data processing is any action taken with or applied to personal data. This includes the collection, use, transfer, disclosure, deletion, destruction and storage of personal data – even its anonymisation.
- **Processor:** a natural or legal person, public authority, agency or another body which processes personal data on behalf of the controller. Two

basic conditions for qualifying as processor exist: that it is a separate entity in relation to the controller and that it processes personal data on the controller's behalf.

([The University of Edinburgh, 2020b](#) and [European Data Protection Board, 2020](#))

Appendix B: Example DPIA

For an example DPIA, please follow [this link](#) to see the DPIA completed by the J-YAP IUSP Project Members (authors of these guidelines). This was approved by the DPO at the University of Edinburgh via OneTrust.

Chapter 2: ICT and Privacy Guidelines for Japanese Language Teachers in the UK

Due to the global outbreak of Covid-19, most universities in the UK have had to move from face-to-face to online teaching since March 2020. In the due course of organising online sessions for Japanese learners across multiple universities, JYAP-IUSP Project Members faced the question of how the personal information of participating students should be handled. The aim of these guidelines is to provide examples of how Japanese language teachers ought to manage student personal information when teaching online to ensure that teaching and learning activities not only run smoothly, but also comply with the privacy policy of the BATJ.

Data Protection and Teacher Conduct

1. Uses of Personal Data

Calls for participants in any activities should be carried out through the official website(s) or associated media of the BATJ or related projects. Teachers must not pass on or otherwise disclose participant personal information such as names, affiliations and email addresses to anyone other than those who are involved in the relevant activities and whose access to such information is necessary in order to conduct the online activity.

Teachers may use their BATJ-registered email address in connection with announcements for seminars, workshops and other educational activities organised by the BATJ, any related special interest group or project team.

However, when communicating with participants via email, this should be done via official university or other affiliated educational institution's email channels as much as possible, with private email addresses avoided as much as possible unless the teacher is a freelancer.

It should be noted that the collection of statistical data such as attendance of participants is important information for the improvement of activities. Therefore, an instructor is expected to use their institution's official Zoom account. The use of a personal Zoom account for official online sessions is not desirable in this regard and may also have negative impacts from a data protection standpoint, as explained in Chapter 1 of these guidelines.

If teachers intend to collect individual participants' email addresses, the relevant purpose for doing so must be clearly stated, e.g. "Please let me know your email address so I can send additional materials".

2. Storage of Personal Data

In order to avoid a security incident, all personal data must be handled carefully.

As a teacher, this means:

- You must not export data or create documents using personal data unless you need to.
- In order to minimise the risk of security incidents, it is advisable not to print out materials containing personal data, download such materials onto a public device or store them on a computer or memory device that you intend on removing from your workplace.

- Use password protection when sending materials containing personal data as an attachment or saving them to a memory device.
- Unless you are a freelancer, you are also strongly advised to use the official Zoom or MS Teams account of your association or affiliated institution rather than a personal account.

According to the Information Security for Education Network (ISEN, 2020), 59.3% of data security incidents in educational institutions in Japan were caused by loss or misplacement of data, while 18.6% were caused by misdistribution. Although the situation in the UK may be different from in Japan, it is clear that human error by teachers is a major factor in causing security incidents. Looking at the manner in which the data were leaked, 62.4% of leakage occurred via physical documents and 12.4% via USB memory stick.

In comparison with these figures, theft accounted for 5.8% of the total security incidents referenced above. However, it should be noted that 84.6% of such theft occurred outside school, which suggests that it is risky to take personal data – and in particular, sensitive data – out of the workplace. In addition, 76.9% of the theft incidents were associated with a breach of relevant regulations, e.g. violating internal regulations by removing a computer or memory device from the school.

Scrutinising the number of incidents by school type, it is notable that while incidents at universities are characterised by large-scale involvement of more than 1,000 students spanning multiple academic years, senior high schools tend to involve 100–500 students from either the same year or class, while

finally, primary schools appear to frequently see class-size groups of 1–10 pupils and 10–50 pupils engaging in data theft.

In terms of when such incidents tend to occur, the average number of cases per month over the past ten years has been higher at the beginning of an academic year and at the end of a semester, when the results of assessments are being processed.

3. Data Subject (Class Participant) Rights

Please ensure that your association or project websites and media have a GDPR/UK GDPR compliant privacy policy, and clearly state who to contact regarding personal data collection/processing and the exercise of data subject rights.

If your students/participants ask any questions regarding their personal data and/or their rights with respect to such data, please refer them to your organisation's DPO.

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Available at: <https://school-security.jp/pdf/2019.pdf> (Accessed: 10 April 2021).

Chapter 3: Copyright

Unless otherwise stated, information in this chapter is quoted directly (with minor adaptations) from guidance provided by the UK government (GOV.UK, no date). The copying and adaptation of this information is allowed under the [Open Government Licence v3.0](#).

1. What is Copyright?

Copyright, along with patents, designs and trademarks, is a type of intellectual property protection which is automatically assigned to the creator of any piece of original work.

A copyright owner could be one person, multiple people or a company, each of whom has the exclusive right to copy, distribute, perform, broadcast or adapt a work.

Where teaching materials are created by an employee in the course of their employment, their employer is the first owner of any copyright of such work (subject to any agreement to the contrary).

The duration of copyright depends on the type of work. For example, literary, dramatic, musical and artistic works are protected by copyright from the date of creation until 70 years following the death of the author or authors.

2. What Does Copyright Protect?

Copyright is automatically assigned when a piece of original work such as the following is created:

- Original literary, dramatic, musical and artistic work, including illustration and photography.
- Original non-literary written work, such as software, web content and databases.
- Sound and music recordings.
- Film and television recordings.
- Broadcasts.
- The layout of published editions of written, dramatic and musical works.

The author of a copyright-protected work has the exclusive right to authorise or prohibit the following acts:

- Reproduction (e.g. photocopying, reproducing a printed page by handwriting, typing or scanning into a computer or taping recorded music).
- Distribution (e.g. a book being sold in a bookshop).
- Rental and lending (e.g. renting from a video store or loaning a CD from a library).
- Public performance (e.g. performing a play in a theatre, playing sound recordings or showing films in public).
- Communication to the public (e.g. broadcasting a work or putting it on the internet).
- Adaptation (e.g. making a film out of a novel, transcribing a musical work,

translating a work into a different language or converting a computer program into a different computer language or code).

Copyright materials cannot be copied or used without permission. To use something protected by copyright you must either:

- Agree a licence with the owner to use it.
- Buy or acquire the copyright.
- Confirm that your intended use falls within the exceptions to copyright (such as teaching).

You may not need permission if you only want to use a “less than a substantial” part of a copyright-protected work (although acknowledgment is required). This is decided on a case-by-case basis* .

In general, a portion of a copyright-protected work will be considered less than substantial unless it could be seen as an important part of the work, for example a key frame from a film or the conclusions of a report.

* Regarding quantity, Copyright Licencing Agency cites 10% as a rough guide. However, if the 10% chosen is the essence of the original material, unauthorised use could be considered infringement (Copyright Licensing Agency, 2019).

3. Exceptions to Copyright (Teaching)

Several exceptions allow limited use of copyright-protected works without the permission of the copyright owner for educational purposes, such as:

- The copying of works in any medium as long as the use is solely to

illustrate a point; it is not done for commercial purposes; it is accompanied by a sufficient acknowledgement; and the use is fair dealing (see below).

- Performing, playing or showing copyright works in a school, university or other educational establishment for educational purposes. However, this only applies if the audience is limited to teachers, pupils and others directly connected with the activities of the establishment. Examples of this are showing a video for English or drama lessons and the teaching of music.
- Recording a TV programme or radio broadcast for non-commercial educational purposes in an educational establishment, provided there is no licensing scheme in place. In general, a licence will be required from the Educational Recording Agency.
- Making copies by using a photocopier or similar device on behalf of an educational establishment for the purpose of non-commercial instruction, provided there is no licensing scheme in place. In general, a licence will be required from the Copyright Licensing Agency.

4. Fair Dealing

Certain exceptions only apply if the use of the work constitutes “fair dealing”.

Example exceptions include activities related to research and private study, criticism or review and news reporting.

Fair dealing is a legal term used to establish whether a use of copyright material is lawful or whether it infringes copyright. There is no statutory definition of fair

dealing – it will always be a matter of fact, degree and impression in each case.

The question to be asked is: how would a fair-minded and honest person have dealt with the work?

Factors that have been identified by the courts as relevant in determining whether a particular dealing with a work is fair include:

- Does using the work affect the market for the original work? If a use of a work acts as a substitute for it, causing the owner to lose revenue, then it is not likely to be fair.
- Is the amount of the work taken reasonable and appropriate? Was it necessary to use the amount that was taken? Usually, only part of a work may be used.

The relative importance of any one factor will vary according to the case in hand and the type of dealing in question.

5. Technological Protection Measures

It is important to be aware that media, such as DVDs and e-books, are often protected by technological protection measures (TPMs) (also known as copy protection measures or a form of digital rights management) which prevent unauthorised access or copying.

TPMs can play an important role in enabling copyright owners to offer content to consumers in different ways, as well as in preventing piracy. EU and UK law protects the right of copyright owners to use TPMs to protect their works, and circumvention of such technology is illegal.

6. Copyright and Online Teaching

The information in this section is largely sourced from the Intellectual Property Office (IPO) guide [Exceptions to copyright: Education and Teaching](#) (IPO, 2014).

Changes have been made to copyright law in order to help teachers to deliver modern multi-media teaching without risk of copyright infringement. This has meant an expansion of exceptions relating specifically to educational establishments, allowing more extensive use of materials in conjunction with educational licensing schemes. Another change permits minor acts of copying for teaching purposes as long as the use is considered fair and reasonable.

In order to copy media which is protected by copyright, educational establishments can apply for educational copying licences, e.g. from the Educational Recording Agency or the Copyright Licensing Agency. This may be useful, for example, to allow teachers to photocopy extracts from books for class handouts or to record television programmes to show to a class. Such licensing schemes are underpinned by copyright exceptions, which means that where a particular work is not covered by a licence, an educational establishment is still able to copy it.

Further changes in copyright law address technological developments. For instance, copyright-protected work may now be shared over secure distance learning networks, while a new general fair dealing exception allows copying of works via any medium, e.g. using laptops and interactive whiteboards, as long as all of the following conditions apply:

1. The work must be used solely to illustrate a point.
2. The use of the work must not be for commercial purposes.
3. The use must be fair dealing.
4. It must be accompanied by a sufficient acknowledgement.

If you do not work for an educational establishment, please note the fair dealing exception applies to acts of teaching instruction in general, i.e. not only within educational establishments. However, please note that the exceptions which allow more generous copying in conjunction with educational licences only apply to educational establishments.

7. Advice for Creating Teaching Materials

This section is quoted directly (with minor adaptations) from information available on the University of Leeds Library website (University of Leeds Library, no date) as well as from the same university's guidance on publishing OERs (University of Leeds, 2017).

Please note: if you are employed by an educational institution, please refer to your own institution's policies or copyright specialists for the most relevant information.

When creating teaching materials, a first recommended option is to find out-of-copyright materials or open access content. However, be sure to abide by any licence conditions associated with the materials. Example sources for out-of-copyright materials include:

- [Creative Commons](#)

- [Directory of Open Access Books](#)
- [Open Access Books on JSTOR](#)
- [青空文庫](#)

When using content found on the internet, provide source links rather than embedding material in your teaching slides.

When publishing teaching materials to be shared on an educational institutions' internal websites, such as on a Virtual Learning Environment, or public facing websites such as YouTube, iTunes U, Jorum or the FutureLearn platform, you must both abide by copyright law and follow any applicable platform publication guidelines.

Your teaching materials may be published online if all of the following apply:

- Your institution (the copyright holder) owns all of the content.
- You have permission to use other people's content.
- You have attributed all the content.

You may publish content owned by your institution as Open Educational Resources (OERs). OERs are online resources that are available for others to use to support learning. It is recommended that you publish such content using a Creative Commons copyright licence.

University of Leeds guidance on the use and publication of OERs includes the following points:

- It is the responsibility of staff and students to ensure that they have the

necessary rights to publish an OER and that all resources published comply with all relevant policies (e.g. copyright, IPR, accessibility).

- Staff are advised to publish OERs using an Attribution-NonCommercial-ShareAlike (CC BY-NC-SA 4.0 International) creative commons licence. Other creative commons licences (e.g. to allow commercial use or remove the ShareAlike element) may be used if staff feel this is necessary or appropriate for their particular resource.
- All resources released as OER must ensure that the university is stated as the licensor and wording must be included on the resource such as © The University of Leeds or equivalent to ensure correct attribution.
- Usually, authors wish to formally assert a “moral” right to be properly acknowledged as the author. The university believes this is good practice as it gives proper recognition for work undertaken. The right must be positively asserted. The following is an example of good wording to ensure proper attribution: “The right of [name of author] to be identified as author of this work has been asserted by them in accordance with the Copyright, Designs and Patents Act 1988”.

8. International Law

While details of copyright law will vary between nation states, the Berne Convention lays down a common framework and agreement between nations in respect to intellectual property rights (The UK Copyright Service, no date).

Based on the three principles of the Berne Convention, protection of copyright work abroad is usually automatic in the same way UK protection works (see

Appendix).

The UK is a member of several international conventions in the field of copyright:

- The Berne Convention for the Protection of Literary and Artistic Works.
- The Rome Convention for the Protection of Performers, Producers of Phonograms and Broadcasting Organisations.
- The World Intellectual Property Organisation (WIPO) Performances and Phonograms Treaty (WPPT).
- The WIPO Copyright Treaty (WCT).
- The Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS).

Copyright material created by UK nationals or residents and falling within the scope of one of these conventions is automatically protected in each member country of the convention by the national law of that country.

Most countries belong to at least the Berne Convention and/or TRIPS, which is a World Trade Organisation (WTO) agreement. The TRIPS Agreement obliges WTO members to comply with the Berne Convention.

The Rome Convention and the WPPT provide some protection for performers, producers of sound recordings and broadcasters, while the WCT enhances certain protection provided by the Berne Convention.

The Berne Convention provides that works will receive automatic protection without formality. However, you may choose to mark your work with the

international © symbol, followed by the name of the copyright owner and year in which the work was created.

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Appendix

The three basic principles of the Berne Convention state that:

- Works originating in one of the Contracting States (that is, works the author of which is a national of such a State or works first published in such a State) must be given the same protection in each of the other Contracting States as the latter grants to the works of its own nationals (principle of "national treatment").
- Protection must not be conditional upon compliance with any formality (principle of "automatic" protection).
- Protection is independent of the existence of protection in the country of origin of the work (principle of "independence" of protection). If, however, a Contracting State provides for a longer term of protection than the minimum prescribed by the Convention and the work ceases to be protected in the country of origin, protection may be denied once protection in the country of origin ceases.

([WIPO, no date](#))

Chapter 4: Inclusive Learning and Teaching

This section outlines the basic principles and practices that help teachers to deliver inclusive online sessions. It provides practical tips for preparation and delivery, as well as for creating accessible teaching materials. For materials in Japanese, an introduction to the UD Digi Kyokasho Font is given, with useful resources provided at the end.

The Equality Act 2010 requires that reasonable adjustments be made “where disabled staff, students or visitors personally experience substantial disadvantage in comparison with non-disabled people” (the Disability Rights Commission, 2007, quoted in Equality Challenge Unit, 2010, p. 2). What counts as reasonable depends on an institution’s circumstances, such as available resources and practicality of changes.

One key point regarding support is that it needs to be available to all users of the institution without them having to disclose their disability (ibid., p. 3). This means that such support must be incorporated into teaching, assessment and teaching materials for all students with or without disabilities or Specific Learning Differences (SpLDs).

1. Online Sessions

The following are some of the arrangements to be implemented for inclusive online sessions. They are quoted with permission from the SOAS Disability and Neurodiversity Team’s *Top 10 Tips for Accessible Online Learning* (no date), referred to here as “Top 10”, and the British Dyslexia Association (BDA) guide,

Dyslexia and Studying from Home (no date), referred to here as “Studying from Home” with modification to suit the purpose of these guidelines.

As the language sessions offered by J-YAP IUSP are not recorded and this programme does not include assessment, these elements are not covered below.

The following information is a summary of the main points regarding online sessions and accessibility. Please see the above two source materials for more details. As the Top 10 guide is internal to SOAS, please contact af15@soas.ac.uk to request access.

1) Before Sessions

- Make all teaching materials such as slides and handouts available in advance of sessions. This includes any documents that will be shared via screenshare (Top 10, p. 1).

2) During Sessions

- Clarify at the start of the course that the aim is for teaching to be as inclusive as possible so that everyone is able to participate. Invite students to communicate confidentially about any needs and concerns they have and to discuss any relevant documents from the institution (e.g. a Study Inclusion Plan). Do not single students out or ask students to reveal a disability within the class (Top 10, p. 1).
- Have a clear structure in sessions. For example, explain at the beginning of the session the structure, the main points and/or the learning

outcomes. Use signposting, paraphrasing and give opportunities to summarise and to reflect (Top 10, p. 2).

- Provide verbal information in bitesize chunks with additional time to process and digest it (Studying from Home, p. 2).
- Consider your e-pedagogy approach. You may need to be more intentional with your behaviour when teaching online in order to promote multisensory and flexible options for a student-centred experience and to promote student contributions. For example, offer clear options for contributing, such as verbally or via a chat function, and if contributions are optional, let students know this (Top 10, p. 2).
- Include regular and small breaks (e.g. during online activities over one hour in duration) and allow all students the option to take a break if they require it by switching their camera off (Top 10, p. 2).
- Invite regular feedback from students on accessibility. Examples include clarity of speech, visual contrast and lighting in video presentations. Consider using multisensory indicators to help orient students with sensory disabilities. This includes explaining visual aspects on screen, writing out key points that come up in the student chat panel and stating file names and slide numbers when referring to PowerPoint files. Give any instructions both verbally and in writing (Top 10, p. 1).

2. Preparation of Written Teaching Materials

The following points outline the general principles and recommended settings for the formatting, layout and design of written teaching materials. They are taken with permission from the *Dyslexia Friendly Style Guide* (2018), referred to here as “Style Guide”, as well as from the aforementioned Top 10 and Studying from Home guides, again with modifications. Please see the source materials for more details.

- Font type: Sans Serif font, such as Arial (Top 10, p. 1). Example alternatives: Verdana, Tahoma, Century Gothic, Trebuchet, Calibri, Open Sans (Style Guide).
- Minimum font size: 12 for Word documents and 18 for PowerPoint (Top 10, p. 1).
- Format: text-based PDF (not a PDF image of text), PowerPoint or Word document (Top 10, p. 1).
- Accessibility features of the programme to be used: for example, headings in Microsoft Word (Top 10, p. 1).
- Emphasis: bold rather than underlines and italics, which can make the text appear to run together, causing crowding (Style Guide).
- Text in uppercase, capital letters or small caps: to be avoided since these can be less familiar to the reader and harder to read (Style Guide).
- Headings and structure: extra space around headings and between paragraphs (Style Guide).

- Visual information to be included: charts, diagrams, colour coding, etc. (Studying from Home, p. 3).
- Text colour: a dark colour (Style Guide).
- Background colour: a light (avoiding white), single colour (cream or a soft pastel colour). Avoid patterns, pictures and distracting surrounds (Style Guide).
- Colour combinations: avoid green and red/pink (difficult for those who have colour vision deficiencies (colour blindness)) (Style Guide).
- Text layout: left alignment without justification (Style Guide).

3. UD Digi Kyokasho Font (UD デジタル教科書体)

1) Background

Universal Design (UD) is a term that was first used by Mace (1985) to describe “design that’s usable by all people, to the greatest extent possible, without the need for adaptation or specialized design”. UD font is one of those type fonts developed with the UD principle and has come to be used widely in Japan in more recent years. For example, UD fonts are employed in road signs, information boards in public transports, public-relations magazines, product labels and packages. It has also been applied to the field of education (e.g. in digital materials and textbooks) as a way to create accessible and inclusive learning materials and environments.

2) About the Font

UD Digi Kyokasho font, designed and released by Morisawa Inc., is a UD typeface that conforms with official curriculum guidelines (学習指導要領) in Japan. The font maintains the form of the directionality of handwriting, including stops and sweep strokes, and reduces contrast while also employing designs that address the concerns of low vision or dyslexia. This has been demonstrated by researchers such as Okumura and Nakano, who have shown that the font increases readability of textbook content (Morisawa Inc., no date).

The UD Digi Kyokasho font family was introduced to Windows users as part of the Windows 10 Japanese Supplemental Fonts package.

3) Useful Resources

The following links provide further information in Japanese about the UD Digi Kyokasho font:

- [「UD フォントをもっと知ろう!」UD デジタル教科書体の開発背景とデザイン 前編](#)
- [「UD フォントをもっと知ろう!」UD デジタル教科書体の開発背景とデザイン 後編](#)
- [「UD フォントをもっと知ろう!」Office 版 等幅・P 付・K 付ってな～に？」](#)

- 発達障害の見え方の問題とUDフォントの効果
- UD教科書体読みやすさの科学的根拠

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Chapter 5: Comparison of Online Platforms

The most commonly used webinar platform for online classes at educational institutions in the UK appears to be Zoom. Therefore, we compare Zoom with two other popular platforms, Blackboard Collaborate Ultra (BCU) and Microsoft Teams (below, simply “Teams”), focusing on the key points for Japanese teachers already familiar with each platform’s basic functions.




Comparison of Zoom, Teams and BCU

Below, © is shown to indicate the platform(s) that we believe to be the most advantageous for Japanese teachers.

	Zoom	Teams	BCU
Scheduling	©	○	○
	<ul style="list-style-type: none"> • Within the same institution, a Zoom link for a co-taught module can be shared by multiple staff members. If seminars or lectures are scheduled at different times, organisers can choose “Recurring meeting” in the settings and add the email addresses of colleagues to “Alternative Hosts”. 	<ul style="list-style-type: none"> • Presenters can schedule recurring meetings in Teams, with all members of the relevant group able to join but only the person who scheduled the meeting permitted to host it. The scheduled Teams meetings are automatically synchronised with Outlook 	<ul style="list-style-type: none"> • A link for a co-taught modules can be shared among multiple staff members. Moderators (teachers) can also set repeat sessions.

	<ul style="list-style-type: none"> • One restriction is that a single link cannot be used to hold two separate sessions simultaneously. 	Calendar or Office 365*.	
Chat	○	◎	○
	<ul style="list-style-type: none"> • When the chat function is enabled via the meeting settings, all participants can share private one-to-one messages. Unless chats are set to save automatically, participants must save them before the end of meetings. • Participants can use the chat to send files. • Host/co-hosts can message people in the waiting room, but not vice versa. • Messages posted in the chat prior to joining breakout rooms can be viewed within these rooms, but any messages sent during breakout room sessions can 	<ul style="list-style-type: none"> • Teachers can choose to send messages to individuals or to all participants. • The content of messages automatically remains in the thread. • Files can be sent via chat function. 	<ul style="list-style-type: none"> • Moderators can choose to send messages to individuals or to everyone. They can also select functions such as “Participants can chat privately only with moderators” and “Moderators supervise all private chats” in the settings. • Messages sent in the “Everyone” channel can be seen during the meeting and remain visible in meeting recordings.

	only be viewed by the members of each room.		
Sharing and Editing Files	◎	◎	○
	<ul style="list-style-type: none"> • The “Remote Control” function enables co-editing of documents with others via the screenshare function. • “Enable annotation for others” enables participants to add comments to the document or the whiteboard shown on the shared screen, although they cannot edit the actual document. 	<ul style="list-style-type: none"> • Teachers can share and display files (e.g. Word, PowerPoint or Excel documents) to participants. • There is also a function to co-edit with others while screensharing. Changes will be saved automatically as long as users are online. • There is a whiteboard function. 	<ul style="list-style-type: none"> • Moderators can show files (e.g. PDFs) and share their display screen with meeting participants. • There is also a whiteboard function.
Recording	◎	○	○
	<ul style="list-style-type: none"> • Hosts can pre-set meetings to be recorded automatically. Alternatively, 	<ul style="list-style-type: none"> • While the recording function can be made available to all 	<ul style="list-style-type: none"> • A recording function is available to moderators.

	<p>recording can be started during the meeting.</p> <ul style="list-style-type: none"> • Even if a host pauses the recording and then restarts it, it can be saved as one uninterrupted file. Following recording, hosts can choose the folder in which to save the file. 	<p>participants by default, it can also be restricted.</p> <ul style="list-style-type: none"> • It is not possible to pause while recording without creating two separate recording files. After recording, the recording file is automatically saved in the video streaming service Microsoft Stream. 	<p>However, it is not possible to pause while recording without creating two separate files.</p> <ul style="list-style-type: none"> • After recording, the recording file is automatically saved under Menu → Recordings.
Breakout Sessions and Creating Groups			
	<ul style="list-style-type: none"> • Participants can be allocated to rooms either automatically or manually. Host can pre-assign participants to specific rooms**. • As long as permissions are granted by the host, participants can move freely by clicking on the “Breakout Rooms” icon and selecting a new room. 	<ul style="list-style-type: none"> • There is a breakout room feature which allows teachers to create groups automatically or manually. • While students can return to the main room if permissions are enabled, they cannot move freely between breakout rooms. 	<ul style="list-style-type: none"> • There is a breakout room function, and moderators can create groups either automatically or manually. • While there is a setting that allows students to move to another group, no option exists to set a timer or countdown for

	<ul style="list-style-type: none"> • Hosts can set a timer and countdown for breakout rooms to end. 	<p>They can, however, move freely by using the Channel function instead of breakout rooms.</p> <ul style="list-style-type: none"> • Hosts cannot set a timer or countdown for breakout rooms to end. 	breakout rooms to end.
Breakout Sessions and Messaging Function	◎	◎	○
	<ul style="list-style-type: none"> • Hosts or co-hosts can send a message from the Main Room to all breakout rooms using the function “Broadcast Message to All”. However, they cannot send files via this channel. A website link can be sent, but the link will not work directly, nor can it be copied. • While in breakout rooms, participants can click the “Ask for help” button to draw hosts’ attention but cannot type 	<ul style="list-style-type: none"> • Teachers can send an announcement to all breakout rooms. • Each breakout room has its own internal chat, with messages accessible during meetings via the teacher’s main Teams chat list. • All users can use the chat function. 	<ul style="list-style-type: none"> • Moderator cannot send messages to individual groups. Communicating with breakout groups can only be done by messaging the Everyone channel or by joining the group. • Participants in breakout rooms can use the “raise hand” feature to communicate with moderators.

	any messages.		
Attendance	Ⓞ	Ⓞ	Ⓞ
	<ul style="list-style-type: none"> • Participant records are saved automatically and can be accessed via the following pathway: Reports → Usage → Report duration → Number of participants. 	<ul style="list-style-type: none"> • Presenters can download an attendance record both during meetings (from the “Participants” tab) and after meetings via the main chat window. 	<ul style="list-style-type: none"> • There is an attendance recording function which allows moderators to view attendance records via the following pathway: Sessions → Session option menu → View reports.
Accessibility and Security	Ⓞ	Ⓞ	Ⓞ
	<ul style="list-style-type: none"> • Hosts can choose to exclude external participants by restricting entry to those with a relevant university email address. Default settings also include a passcode to enter and a waiting room function through which hosts can restrict who can join meetings. • Furthermore, hosts can restrict access to those with a specific email domain, 	<ul style="list-style-type: none"> • A meeting held within a team is accessible by all members of that team. Teachers can invite guests by sending an invitation with a public link that can be used and shared by anyone who has it. 	<ul style="list-style-type: none"> • Sessions are accessible to everyone registered on the relevant module. Teachers can invite guests by sending an invitation with a public link that can be used and shared by anyone who has it.

	e.g. of that belonging to their university.		
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* As Teams belongs to Microsoft, it has the benefit of being easily linked up with other Microsoft applications (e.g. Forms, OneNote), as well as being intuitive to use for those familiar with Microsoft products in general. However, some teachers have commented on the high computer memory use of Teams, which has at times caused their computers to crash or freeze.

** When scheduling or editing a meeting, select the “Breakout Room pre-assign” option. This allows hosts to create rooms and assign participants by entering their email addresses. It is also possible to pre-assign everyone at once by uploading a list of participants using the template provided by Zoom upon selecting this option. The only limitation of this is that participants must sign into Zoom using the email address by which they have been pre-assigned, or else the host will need to manually assign them. Teachers should always anticipate having a few students who have not signed in with the correct email address. As participants join the Zoom meeting, their names will start appearing in the list to be assigned to breakout rooms. In order to use pre-assigned breakout rooms, the host must select “Send participants to the pre-assigned rooms” under “Options” prior to opening the rooms.

1. Conclusion

While it is necessary to consider factors such as accessibility and security, the reach of which extends beyond the classroom, from a teaching perspective, Zoom appears to be the most convenient option. This is in no small part thanks to its breakout room function, which allows automatic and instant creation of groups that can be easily managed with the platform’s inbuilt timer and countdown functions. In addition, it is our impression that Zoom’s automatic attendance recording function is also

easy for teachers to use. However, as each webinar platform has its own strengths and weaknesses, our recommendation is that teachers select the one that best suits the needs of both themselves and their students.

2. Final Notes

- With all of the above platforms, differences in the version of programme used between teachers and students can create cases where some functions (e.g. Zoom breakout rooms) cannot be used. Therefore, it is necessary for all users to download the most recent version at their own risk. In this respect, it seems that BCU may present some advantage, as the same version is typically used uniformly within institutions.
- Available functions vary depending on the institutional settings or account type as well as on the user device (mobile phone, iPad, etc.).
- The information included in these guidelines is based on the Zoom functions available to Zoom Pro accounts and above. Some of the functions described are not available on free Zoom accounts.
- The information above is based on teachers' experiences as well as on the user guide available for each platform. Please note that available functions may differ slightly depending on each institution's settings. For further information and updates, please refer to the relevant platform support site listed below.

3. Platform Support Sites

Official support for each of the above platforms can be found at the following links:

- [Zoom](#) | [Teams](#) | [BCU](#)

Guideline Authors and Contributors

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